

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Bianey GARCIA PEREZ, Maria MARTINEZ CASTRO, J.M.Z., Alexander MARTINEZ HERNANDEZ, on behalf of themselves as individuals and on behalf of others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION SERVICES; Ur JADDOU, Director, U.S. Citizenship and Immigration Services; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW; Mary CHENG, Acting Director, Executive Office for Immigration Review,

Defendants.

Case No. 2:22-cv-00806-JHC

JOINT MOTION TO EXTEND PAGE LIMITS & ORDER

NOTE ON MOTION CALENDAR: July 29, 2024

The Parties jointly file this motion pursuant to Local Civil Rule 7(f). As the Parties have explained in several status reports to the Court, they have been negotiating a settlement agreement to resolve Plaintiffs' claims in this matter. The Parties have now finalized that agreement. As detailed in Plaintiffs' complaint, this case involves a proposed nationwide class action with several subclasses, and thus the Parties' agreement to address all claims in this matter is detailed and complex. The forthcoming motion for preliminary approval of the class action settlement must address several factors. Given that this is a nationwide class action, and in order to apprise the Court fully of the grounds for forthcoming motions, the Parties request that the Court extend the page limit for their Joint Motion for Preliminary Approval of Class Action Settlement and Request for Fairness Hearing, to 4800 words.

JOINT MOTION TO EXTEND PAGE LIMITS & ORDER-1 2:22-ev-00806-JHC

1	Dated this 29th day of July, 2024.	
2	Respectfully submitted,	
3		
4	For the Plaintiffs:	For the Defendants:
5	/s/ Matt Adams	BRIAN M. BOYNTON
6	Matt Adams	Principal Deputy Assistant Attorney General U.S. Department of Justice, Civil Division
7	/s/ Aaron Korthuis Aaron Korthuis	WILLIAM C. PEACHEY
8	Northwest Immigrant Rights Project	Director
9	615 Second Avenue, Suite 400 Seattle, WA 98104	WILLIAM C. SILVIS Assistant Director
10 11 12	(206) 957-8611 matt@nwirp.org aaron@nwirp.org	CHRISTINA PARASCANDOLA Senior Litigation Counsel
13 14	/s/ Mary Kenney Mary Kenney	RUTH CHECKETTS Special Attorney
15	/s/ Trina Realmuto Trina Realmuto	/s/ Aneesa Ahmed ANEESA AHMED
16	/s/ Kristin Macleod-Ball	MARIE FEYCHE Trial Attorneys
17	Kristin Macleod-Ball	Office of Immigration Litigation District Court Section
18	National Immigration Litigation Alliance 10 Griggs Terrace	Department of Justice, Civil Division
19	Brookline, MA 02446	P.O. Box 868, Ben Franklin Station Washington, D.C. 20044
20	(617) 819-4447 mary@immigrationlitigation.org	(202) 451-7744 Aneesa.Ahmed@usdoj.gov
21	trina@immigrationlitigation.org kristin@immigrationlitigation.org	
22		
23		
24		
25		
26		

JOINT MOTION TO EXTEND PAGE LIMITS & ORDER- 2 2:22-cv-00806-JHC

ORDER Before Court is the Parties' Motion to Extend Page Limit for their Joint Motion Preliminary Approval of Class Action Settlement and Request for Fairness Hearing. Dkt. #71. The Court finds that good cause exists to extend the page limit for the joint motion, and accordingly ORDERS that the following word limits apply to the Parties' Joint Motion for Preliminary Approval of Class Action Settlement and Request for Fairness Hearing: 4800 words. Dated this 29th day of July, 2024. John H. Chun UNITED STATES DISTRICT JUDGE

JOINT MOTION TO EXTEND PAGE LIMITS & ORDER- 3 $2{:}22{-}\mathrm{cv}{-}00806{-}\mathrm{JHC}$